

---

## DECLARATION OF CHRISTIAN PATRICK PEYTON

---

1. My name is Christian Patrick Peyton, I have personal knowledge of the facts affirmed in this Declaration, I am competent to testify regarding them, and I swear under penalty of perjury that they are true.

2. I was recently employed by CoreCivic and worked at CoreCivic's Trousdale Turner Correctional Center. I ended my employment with CoreCivic on August 11, 2022.

3. During my time as an employee at Trousdale Turner Correctional Center, I witnessed several concerning matters affecting safety and security at the institution, some of which are detailed below.

4. New employees at Trousdale Turner Correctional Center are told about the "Trousdale Turner - Close It Down" Facebook page and are warned to stay off of it because CoreCivic monitors it. New employees at Trousdale Turner Correctional Center are also told about Nashville attorney Daniel A. Horwitz, and they are instructed not to engage with him or provide information to him. New employees are additionally informed that CoreCivic employs its own attorneys, is highly capitalized, and can outlast any lawsuit.

5. TDOC has a contractual obligation with CoreCivic. CoreCivic is in violation of its contractual requirements, especially staffing. For instance, units are A, B, C, W, F, and E. Each unit is required to have at least three Correctional Officers (COs), one Sergeant (SGT), and one Case Manager per pod (there are three pods in a unit). Most units, however, have one or possibly two officers per unit. This poses a danger to both inmates and employees.

6. Most Trousdale Turner Correctional Center employees are burned out and

rarely do anything.

7. When inmates are supposed to be locked down, their cell doors are to be checked and ensured to be locked. This prevents inmates from “popping out” and attacking staff or other inmates. For example, if you go into C unit which is where many diabetics are, the doors are blocked from locking by the inmates. They put paper or something else between the door to prevent it from locking so that they can get out of their cell whenever they want. This goes on in all the other units as well, not just C. For example, approximately a week ago, an inmate with a gang affiliation snuck out of his unit and entered another unit. He was not detected and was allowed entry. If the CO was doing their job, this would not have happened. That inmate then went and attacked another gang member brutally. It was believed he may have lost his eye in the attack. This and similar incidents could have been prevented easily if the staff levels at Trowsdale Turner Correctional Center were compliant with contractual requirements and people did their jobs.

8. Inmates are not allowed to have cell phones, but they do. By allowing the inmates to have cell phones, inmates can communicate with criminals on the outside, and they extort other, weaker inmates, making them pay “rental fee” for a room or collecting debts. They also use cell phones to extort families of inmates or to extort employees.

9. The idea of using cell jammers was brought up to prevent these consequences. By using cell jammers, if an inmate had a cell phone, it would basically block it, stopping the problem. This was tested in another prison this year when an inmate used a cell phone to order the hit and killing of a CO. The BOP found it favorable to use. CoreCivic has refused to implement this idea at Trowsdale Turner Correctional Center, even though doing so would save lives. It is my opinion that the reason is because

someone employed at Trousdale Turner Correctional Center is involved in trafficking contraband.

10. Drugs are probably more accessible to people at Trousdale Turner Correctional Center than on the street. Of course, drugs must be getting in somehow. This falls primarily on employees who are dirty or during visitation when people from outside bring in contraband, however, an inmate once kicked out a window and was able to go and retrieve contraband at night. If CoreCivic cared about preventing drugs from entering the prison, they would take action to prevent it or change policies to stop the flow of drugs.

11. Inmates housed in F (the treatment Unit), are given meds to help them with addiction. However, the inmates have discovered that they can abuse them as well. Within the last week, since visitation, we have had around seven overdoses. Trousdale Turner Correctional Center has also had employees knocked out and had to use Narcan to revive them.

12. CoreCivic states publicly that it is committed to rehabilitation and offers classes to help inmates improve themselves. The only class I have seen at Trousdale Turner Correctional Center is for a GED. Inmates do not get any meaningful rehabilitative help. Speaking to them, they wish there was a trade or something else they could learn (carpentry, plumbing, etc.) to improve themselves. Hispanic inmates have been wanting to learn English. They have not been helped.

13. I was told that Trousdale Turner Correctional Center employees have written false, negative information into inmate disciplinary records so that when they go up for parole, they get denied. This happens to maintain the high inmate population. Inmates thereafter get upset because they have been on good behavior and were denied

parole because an employee wrote a lie about them, causing them to lose hope. Inmates then conclude that behaving does not benefit them and that they wasted years following the rules. One example of this involved a Trousdale Turner Correctional Center case manager falsely stating, in an official record, that an inmate was violent when he was not, causing him to be denied parole.

14. CoreCivic will hire anybody and everybody. Most employees quit because they realize it is not for them. Some get fired for being dirty.

15. In prison, everyone should be treated the same way. At Trousdale Turner Correctional Center, though, if you are an inmate who is high up on the totem pole, you basically get whatever you want. You have some inmates wearing Gucci. You have some inmates with CASHAPP and making substantial amounts of money while in prison. Then, you have those who are targets of those with everything.

16. All of these things could be stopped if CoreCivic actually cared to stop them. By not caring or doing anything to prevent these things, though, I believe that CoreCivic is just as guilty as those in prison. To CoreCivic, prison is just a business.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: Aug 11, 2022.

*Christian Patrick Peyton*

Christian Patrick Peyton (Aug 11, 2022 15:25 CDT)

Christian Patrick Peyton


# Declaration of Christian Patrick Peyton


Final Audit Report


2022-08-11


Created:	2022-08-11
By:	Horwitz Law PLLC (daniel@horwitz.law)
Status:	Signed
Transaction ID:	CBJCHBCAABAAGpmQV4SR776Lj94FR2ADqmgpXeBi7_c


## "Declaration of Christian Patrick Peyton" History


 Document created by Horwitz Law PLLC (daniel@horwitz.law)  
2022-08-11 - 8:22:50 PM GMT- IP address: 69.226.239.171

 Document emailed to ziggyzigzag71@hotmail.com for signature  
2022-08-11 - 8:23:27 PM GMT

 Email viewed by ziggyzigzag71@hotmail.com  
2022-08-11 - 8:24:57 PM GMT- IP address: 68.52.65.225

 Signer ziggyzigzag71@hotmail.com entered name at signing as Christian Patrick Peyton  
2022-08-11 - 8:25:29 PM GMT- IP address: 68.52.65.225

 Document e-signed by Christian Patrick Peyton (ziggyzigzag71@hotmail.com)  
Signature Date: 2022-08-11 - 8:25:30 PM GMT - Time Source: server- IP address: 68.52.65.225

 Agreement completed.  
2022-08-11 - 8:25:30 PM GMT



Adobe Acrobat Sign